



Peter W. Baldwin Partner peter.baldwin@faegredrinker.com 212-248-3147 direct Faegre Drinker Biddle & Reath LLP 1177 Avenue of the Americas, 41st Floor New York, New York 10036 +1 212 248 3140 main +1 212 248 3141 fax

August 19, 2021

BY ECF

Honorable Brian M. Cogan United States District Judge United States District Court Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201

Re: United States v. Urooj Rahman, Case No. 20-CR-203 (BMC)

Dear Judge Cogan:

By this letter, defendant Urooj Rahman respectfully requests that the terms and conditions of her pretrial release be modified to allow her to attend the funeral and burial of her brother.

Ms. Rahman has been home detention, without incident, for over a year. I have discussed the proposed modification with Ms. Rahman's Pretrial Services Officer, Ramel Moore, as well as with the assigned Assistant United States Attorneys. Neither Pretrial Services nor the government object to Ms. Rahman's request.

Ms. Rahman's brother passed away in Dubai on August 13, 2021. The family is in the process of repatriating the body to the United States. The family intends to have the funeral and burial within 24 hours after the body arrives in the United States. In addition, the family plans to have the funeral and burial on the same day.

Given the difficulty of obtaining an exact date for the repatriation of Ms. Rahman's brother's body, Ms. Rahman respectfully requests that the Court allow Ms. Rahman to attend the funeral and burial on a date and during times approved by Pretrial Services. As soon as Ms. Rahman knows the date for the services, she will provide this information to Pretrial Services and will obtain approval for windows of time to be out of her residence. Pretrial Services is amenable to this request. The addresses for both the funeral and burial previously have been provided to Pretrial Services.

Thus, for the foregoing reasons, Ms. Rahman respectfully requests that the Court modify the terms and conditions her pretrial release to allow her to attend her brother's funeral and burial on a date and during times approved by Pretrial Services.

If Your Honor is in agreement with the proposed modification, we would respectfully request that you SO ORDER this application.

Thank you for Your Honor's attention to this matter.

Respectfully,

Peter W. Baldwin

SO ORDERED,

Honorable Brian M. Cogan United States District Judge

Date

cc: All Counsel of Record (via ECF)
Pretrial Services Officer Ramel Moore